

MAY 12 2016

JULIA C. DUDLEY, CLERK  
BY: *Moody*  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION  
MAY 2016 SESSION

UNITED STATES OF AMERICA	)	Criminal No. 6:16-CR-000 <u>07</u>
	)	
vs.	)	<b>INDICTMENT</b>
	)	
IVAN RODRIGUEZ CHAVEZ, aka "Chino"	)	<b><u>In Violation of:</u></b>
JUSTIN RAY GOODMAN	)	
WILLIAM MATTHEW HYLTON	)	Title 21, U.S.C. § 846
	)	Title 21, U.S.C. § 841(a)(1)
	)	Title 18, U.S.C. § 922(g)(1)
	)	Title 18, U.S.C. § 922(g)(5)
	)	Title 18, U.S.C. § 924(c)

**COUNT ONE**

The Grand Jury charges:

1. Beginning on or about April 2015, and continuing thereafter through April 2016, in the Western Judicial District of Virginia and elsewhere, the defendants, IVAN RODRIGUEZ CHAVEZ, aka "Chino," JUSTIN RAY GOODMAN, and WILLIAM MATTHEW HYLTON, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United States: 1) to possess with intent to distribute and to distribute 50 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A); and (2) to possess with intent to distribute and to distribute a measurable quantity of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

2. All in violation of Title 21, United States Code, Section 846.

## **COUNT TWO**

The Grand Jury further charges:

1. That on or about March 10, 2016, in the Western Judicial District of Virginia, the defendant, JUSTIN RAY GOODMAN, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

## **COUNT THREE**

The Grand Jury further charges:

1. That on or about March 14, 2016, in the Western Judicial District of Virginia, the defendant, JUSTIN RAY GOODMAN, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

## **COUNT FOUR**

The Grand Jury further charges:

1. That on or about March 31, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino", did knowingly and intentionally distribute a measurable quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

### **COUNT FIVE**

The Grand Jury further charges:

1. That on or about April 5, 2016, in the Western Judicial District of Virginia, the defendant, JUSTIN RAY GOODMAN, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

### **COUNT SIX**

The Grand Jury further charges:

1. That on or about April 5, 2016, in the Western Judicial District of Virginia, the defendant, JUSTIN RAY GOODMAN, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute Cocaine and Methamphetamine, as heretofore set forth in Count One of this Indictment.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

### **COUNT SEVEN**

The Grand Jury further charges:

1. That on or about April 5, 2016, in the Western Judicial District of Virginia, the defendant, JUSTIN RAY GOODMAN, having previously been convicted of a crime punishable by more than one year of imprisonment, did knowingly possess one or more firearms, to wit: a Bushmaster Carbon 15 .223 caliber rifle and a Kimber Pro Carry II .45 caliber pistol, both of which had previously been shipped or transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Section 922(g)(1).

### **COUNT EIGHT**

The Grand Jury further charges:

1. That on or about April 13, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino," did knowingly and intentionally distribute a measurable quantity of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

### **COUNT NINE**

The Grand Jury further charges:

1. That on or about April 19, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino," did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

### **COUNT TEN**

The Grand Jury further charges:

1. That on or about April 19, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino," did knowingly and intentionally possess with intent to distribute a measurable quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

### **COUNT ELEVEN**

The Grand Jury further charges:

1. That on or about April 19, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino," did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Distribute Cocaine and Methamphetamine, as heretofore set forth in Count One of this Indictment.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A).

### **COUNT TWELVE**

The Grand Jury further charges:

1. That on or about April 19, 2016, in the Western Judicial District of Virginia, the defendant, IVAN RODRIGUEZ CHAVEZ, aka "Chino," then being an alien illegally and unlawfully in the United States, did knowingly possess a firearm, to wit: a Ruger SR-22 .22 caliber pistol, which had previously been shipped or transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, Section 922(g)(5).

### **COUNT THIRTEEN**

The Grand Jury further charges:

1. That on or about April 19, 2016, in the Western Judicial District of Virginia, the defendant, WILLIAM MATTHEW HYLTON, did knowingly and intentionally possess with intent to distribute and distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

## **NOTICE OF FORFEITURE**

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, defendants IVAN RODRIGUEZ CHAVEZ, aka "Chino," JUSTIN RAY GOODMAN, and WILLIAM MATTHEW HYLTON, whether collectively or individually, shall forfeit to the United States:

- (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to Title 21 United States Code, Section 853(a)(1);
- (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to Title 21 United States Code, Section 853(a)(2);
- (c) any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c); and
- (d) any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c),

without regard to the type of interest held, wherever located and in whatever name held.

2. The property to be forfeited to the United States includes but is not limited to the following property:

**(a) Money Judgment**

Not less than \$1,147.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of the aforestated offense or is traceable to such property.

**(b) Firearms and Ammunition**

- 1) Ruger, Model: SR-22, Caliber .22, S/N 361-07954
- 2) Kimber, Model: Pro Carry II, Caliber .45, S/N KR130460
- 3) Bushmaster, Model Carbon 15, Caliber .223/5.56mm, S/N CRB008393
- 4) Approximately 100 rounds of miscellaneous ammunition

(c) Vehicles

- 1) 2003 Ford Expedition, VIN# 1FMFU16L13LA75567
- 2) 2006 Jeep Grand Cherokee, VIN# 1J4GR48K76C279238
- 3) 2001 Honda Civic, VIN# 1HGEM22501L121496
- 4) 1996 Honda Accord, VIN# 1HGCD5637TA288924

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property and including but not limited the property described above in paragraph 2.

A TRUE BILL this 12<sup>th</sup> day of May, 2016.

/s/ Grand Jury Foreperson  
FOREPERSON

  
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JOHN P. FISHWICK, JR.  
UNITED STATES ATTORNEY